

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH ALL DEFENDANTS AND
PRELIMINARY CERTIFICATION OF A SETTLEMENT CLASS**

PLEASE TAKE NOTICE that upon the filing of the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement With All Defendants and Preliminary Certification of a Settlement Class, and all papers and pleadings submitted therewith, Plaintiffs, through their undersigned counsel, hereby move this Court before the Honorable Denise L. Cote, U.S.D.J., for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure:

1. Preliminarily approving the proposed settlement with all Defendants;
2. Preliminarily certifying the Settlement Class for settlement purposes only;
3. Approving the proposed forms of notice to the Settlement Class of the proposed settlement;
4. Approving the proposed methods for disseminating notice to the Settlement Class;
5. Certifying the Class Plaintiffs as representatives of the Settlement Class;
6. Appointing Quinn Emanuel Urquhart & Sullivan, LLP Lead Counsel and Pearson, Simon & Warshaw, LLP as Co-Lead Counsel for the Settlement Class;
7. Appointing Garden City Group as claims administrator and Signature Bank as escrow agent; and

8. Granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiffs submit herewith (1) the Plaintiffs' Motion for Preliminary Approval of Settlement with All Defendants and Preliminary Certification of a Settlement Class; (2) the Declaration of Daniel L. Brockett in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with All Defendants and Preliminary Certification of a Settlement Class, as well as the exhibits attached thereto; (3) the Declaration of Darrell Duffie in Support of Plaintiffs' Motion for Preliminary Approval of Settlement With All Defendants and Preliminary Certification of a Settlement Class; and (4) the Declaration of the Hon. Daniel Weinstein (Ret.) in Support of Plaintiffs' Motion for Preliminary Approval of Settlement With All Defendants and Preliminary Certification of a Settlement Class.

Dated: October 16, 2015

Respectfully Submitted,

/s/ Daniel L. Brockett

Daniel L. Brockett

Steig D. Olson

Sascha N. Rand

Jonathan Oblak

51 Madison Avenue, 22nd Floor

New York, New York 10010

Telephone: (212) 849-7000

Fax: (212) 849-7100

danbrockett@quinnemanuel.com

steigolson@quinnemanuel.com

sascharand@quinnemanuel.com

jonoblak@quinnemanuel.com

Lead Counsel for Plaintiffs

Bruce L. Simon

Clifford Pearson

George S. Trevor
Pearson, Simon, & Warshaw, LLP
44 Montgomery Street, Suite 2450
San Francisco, California 94104
Telephone: (415) 433-9000
Fax: (415) 433-9008
bsimon@pswlaw.com
cpearson@pswlaw.com
gtrevor@pswlaw.com

Co-Lead Counsel for Plaintiffs